

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

§

V.

§

CASE NO. 3:07-CR-186-P

HERBERT JENA

§

DEFENDANT' S AMENDED EXHIBIT LIST

TO THE HONORABLE JORGE SOLIS, JUDGE, UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION:

COMES NOW HERBERT JENA, the Defendant and submits his list of exhibits.

Exhibit	Description	Offered	Admitted
1	Nancy Munoz - Factual Resume		
2	Nancy Munoz - 2006 Form 8453		
3	Nancy Munoz - 2006 Tax Return		
4	Nancy Munoz - 2006 Tax Return Transcript/Printout		
5	Nancy Munoz -2006 Tax Return summary		
6	Nancy Munoz - Truth In Lending Disclosures		
7	State v Nancy Munoz, F03-34540-UR, court's file		
8	Sentencing Table		
9	Text of §5K1.1, U.S.S.G.		
10	Reserved		

11	Aurora Perez -Plea Agreement		
12	Aurora Perez - Factual Resume		
13	through 19 reserved		
20	Dallas Police Department Report of January 20, 2007		
21	Records of Police Calls for Service, 5625 Alpha Road		
22	Dallas Police Department Report of February 26, 2007		
23	Fort Worth Police Department Report of April 11, 2007		
24	Herbert Jena Sprint Mobil Phone billing records, 11/21/06 through 2/21/07		
25	Closing Notice from IRS to Herbert Jena for 2006		
26	Ft. Worth Police Report from 4.10.07		
27	through 29 reserved		
30	Map of Dallas and Tarrant Counties with locations of Herbert Jena business		
31	Mangoma Business Card		
32	Fuel Tax Form		
33	Federal Express receipts		

34	Repair receipt for Hummer motor vehicle		
35	through 39 reserved		
40	TaxWise Chart of E-File process		
41	Chart of Life Cycle for an E-file		
42	ERO Bank Application - Santa Barbara Bank and Trust		
43	TaxWise Summary showing return refunds and preparation fees		
44	TaxWise Summary showing customers that subscribed to Audit Shield		
45	TaxWise Summary showing fees paid to Kudzai Mangoma		
46	TaxWise Summary showing fees paid to Takaona Investments		
47	through 49 reserved		
50	Check to Farai S. Chadenga deposited into Takaona Investments Bank account		
51	Check to Noemi Lopez deposited into Takaona Investments bank account		

52	Check to Rayford Isaac deposited into Takaona Investments bank account		
53	Check to Alberto Rodriguez deposited into Takaona Investments bank account		
54	through 59 reserved		
60	Tax Return Summary for Jessica Jackson		
61	Tax Return Summary for Benjamin Romero		
62	Tax Return Summary for Delma L. Rodriguez		
63	Tax Return Summary for Elain Gonzales		
64	Tax Return Summary for Felipe D. Rojas and Magali Hernandes		
65	Tax Return Summary for Heriberto Pozos		
66	Tax Return Summary for Kathy A. DeLeon		
67	Tax Return Summary for Geronimo Avelino		
68	through 69 reserved		

70	TaxWise Invoice for Takaona Investments Account		
71	TaxWise Statement for Account #98246446		
72	TaxWise Customer Service Records on calls from Don Mangoma		
73	through 79 reserved		
80	Wachovia Bank Records for Kays Wireless Gift Shop Tax Service, Account # 2000030022726		
81	Wachovia Bank Records for Kays Wireless Gift Shop Tax Service, Account # 2000030022739		
82	Bank of America Records for Garcia Tax Services LLC, Account # 488001896259		
83	Bank of America Records for Garcia Tax Services LLC, Account # 488001896262		
84	Bank of America Records for Kudzai Mangoma, Account # 004799116586		
85	Bank of America Records for Takaona Investments LLC, Account # 004796566281		

86	ING Bank Records for Takaona Investments LLC, Account # 16000078432		
87	through 89 reserved		

The Defendant reserves the right to offer into evidence any exhibit or part of an exhibit listed on the government's witness list.

The Defendant reserves the right to supplement this list consistent with his rights to Due Process of Law under the Fifth Amendment and his rights under the Sixth Amendment, including effective assistance of counsel, compulsory process and the right to confront and cross-examine witnesses.

Respectfully Submitted,

/s/ J. Craig Jett
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Attorney for Defendant
Herbert Jena

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Defendant's Exhibit List was served upon Assistant United States Attorney, David Jarvis by electronic filing on March 28, 2010.

/s/ J. Craig Jett
J. CRAIG JETT